

ZEICHNER ELLMAN & KRAUSE LLP

1211 AVENUE OF THE AMERICAS

NEW YORK, NEW YORK 10036

(212) 223-0400

FAX: (212) 753-0396

www.zeklaw.com

DIRECT DIAL

(202) 783-0316

dmorrissy@zeklaw.com

April 19, 2019

BY FIRST CLASS MAIL

Dennis Stewart & Krischer, PLLC
Attn: Harry Dennis, III, Esq. & Ning Ye, Esq.
2007 15th Street, North, Suite 201
Arlington, VA 22201

Guo v. Xia; Discovery Responses; Case No. 1:18-CV-00174-LO-TCB

Mr. Dennis & Mr. Ye:

As I discussed with Mr. Ye in our recent telephone conversation, the Word document containing all of your client's discovery demands I received by e-mail contains certificates of service stating that Mr. Ye served such demands by first-class mail, however, my office never received a hard copy of such document(s). Rather than reject all of your client's demands out of hand for improper service, and in a good faith attempt to narrow the outstanding procedural issues in this action, we enclose herewith plaintiff's objections and responses to your client's requests for production and notice to admit.

As I also discussed with Mr. Ye, we hereby formally reject your client's interrogatories as they are not in compliance with FRCP 33 in that your client has propounded significantly more than the allowable number of interrogatories.

Finally, as I discussed with Mr. Ye, your client's requests for production and notice to admit are largely unintelligible and objectionable. Plaintiff has no issue producing all the documents responsive to unobjectionable requests that are in his possession. To that end, upon your review of the enclosed objections and production, please contact me so that we may narrow what you are truly seeking in connection with the litigation of this matter.

I look forward to speaking with you, and attempting to resolve any remaining discovery related differences our clients have.

Sincerely,



J. David Morrissy

Enclosures